

*cockaded Woodpecker Assessment: Havelock Bypass US 70 (R-1015), Craven County, North Carolina* (Appendix B) presents evidence of an unknown RCW cluster, or clusters, in the vicinity of the bypass project. Appropriate surveys should have been conducted in an attempt to locate this "unknown" colony.

(B) Also, a very impressive feature of the project area is the expansive tracts of flatwoods that are strongly dominated by longleaf pine - many of these tracts are of very good quality, from a natural community perspective. Further, these longleaf pine flatwoods occur on various soil types, including ones such as Lenoir. The combination of high quality longleaf pine flatwoods over Lenoir soil is of interest - most such areas were long ago converted to agricultural fields or intensively managed tree farms.

These longleaf pine areas are of special concern. The longleaf pine ecosystem is considered to be critically endangered, i.e., greater than a 98% historical decline (see *Endangered Ecosystems of the United States: a Preliminary Assessment of Loss and Degradation*, National Biological Service, Biological Report 28). Further, much of this flatwoods acreage is of the community type "Mesic Pine Flatwoods". High quality examples of this community type are now rather rare. Given the widespread acreage of mesic soils now under cultivation in the Coastal Plain, this is probably the longleaf pine community type that has declined the most from presettlement times." (See DEHNR, N.C. Natural Heritage Program 1994.)

However, in the discussion of "Biotic Communities" (p. 3-46), the Pine Flatwoods communities are said to be dominated by loblolly pine, and the significance of these flatwoods tracts is not even mentioned. Such an omission strongly brings into question the adequacy of this document.

(C) Equally troublesome is the fact that DOT biologists, or biologists contracted by DOT, obviously overlooked a major population of spring-flowering goldenrod (*Solidago verna*), a Federal Species of Concern. On pages 4-44, the EA states that Corridor 3 "borders documented populations of spring-flowering goldenrod, flaxleaf gerardia, and Georgia nutrush. These documented populations inhabit the power line easement denoting the western corridor boundary." However, in late November 1996, a biologist contracted by the U.S. Forest Service (see Section 3: *Botanical Analysis, Proposed U.S. 70 Bypass, Havelock North Carolina*, in Appendix A) discovered a major population of spring-flowering goldenrod in the area. This population not only lies within the powerline corridor that makes up the western boundary of the proposed corridor, but also occurs within adjacent flatwoods and within powerline corridors farther north, such that Alternative 3 will destroy a major portion of the population.

(D) Apparently no survey work was conducted for rough-leaf loosestrife, a Federally listed species, within the proposed corridors or elsewhere.